

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION

This Document Applies To:

*In re Lehman Brothers Equity/Debt
Securities Litigation, 08-CV-5523 (LAK)*

Case No. 09-MD-2017 (LAK)

ECF CASE

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
CLASS ACTION SETTLEMENT WITH DEFENDANT
ERNST & YOUNG LLP AND APPROVAL OF PLAN OF ALLOCATION**

TO: All Counsel of Record

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 23(e) and this Court's December 3, 2013 Order Concerning Proposed Settlement with Defendant Ernst & Young LLP [ECF No. 542; MDL ECF No. 1350], and upon the Joint Declaration of David Stickney and David Kessler in Support of (A) Plaintiffs' Motion for Final Approval of Class Action Settlement with Defendant Ernst & Young LLP and Approval of Plan of Allocation and (B) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement with Defendant Ernst & Young LLP and Approval of Plan of Allocation; and all other papers and proceedings herein, Plaintiffs, through their undersigned counsel, will and do hereby move this Court on April 15, 2014, at 4:30 p.m. in the Courtroom of the Honorable Lewis A. Kaplan, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 21B, New York, New York 10007, or at such other location and time as set by the Court, for entry of Judgment

approving the proposed Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Allocation as fair and reasonable.

DATED: March 11, 2014

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

/s/ David R. Stickney

DAVID R. STICKNEY

MAX W. BERGER
1285 Avenue of the Americas, 38th Floor
New York, NY 10019
Tel.: (212) 554-1400
Fax: (212) 554-1444
-and-
DAVID R. STICKNEY
NIKI L. MENDOZA
BRETT M. MIDDLETON
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel.: (858) 793-0070
Fax: (858) 793-0323

**KESSLER TOPAZ
MELTZER & CHECK, LLP**

/s/ David Kessler

DAVID KESSLER

DAVID KESSLER
GREGORY M. CASTALDO
KIMBERLY JUSTICE
JENNIFER L. ENCK
280 King of Prussia Road
Radnor, PA 19087
Tel.: (610) 667-7707
Fax: (610) 667-7056

*Co-Lead Counsel for Plaintiffs
and the Settlement Class*